

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE APPLICATION OF Sakab Saudi Holding :
Company, Alpha Star Aviation Services Company, :
Enma Al Ared Real Estate Investment and Development :
Company, Kafa'at Business Solutions Company, : Misc. Civil Action No _____
Security Control Company, Armour Security Industrial :
Manufacturing Company, Saudi Technology & Security :
Comprehensive Control Company, Technology Control :
Company, New Dawn Contracting Company, and Sky :
Prime Investment Company, :
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For Order Pursuant to 28 U.S.C. § 1782 for the Issuance :
of Subpoenas to Citibank NA, HSBC Bank USA NA, :
Cadwalader, Wickersham & Taft LLP, and Jonathan :
Wainwright, Esq. :
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**DECLARATION OF JONATHAN S. SACK IN SUPPORT OF APPLICATION FOR AN
ORDER PURSUANT TO 28 U.S.C. § 1782 FOR THE ISSUANCE OF SUBPOENAS TO
CITIBANK NA, HSBC BANK USA NA, CADWALADER, WICKERSHAM & TAFT
LLP, AND JONATHAN WAINWRIGHT, ESQ.**

I, JONATHAN S. SACK, hereby declare under penalty of perjury pursuant to 28 U.S.C.
§ 1746, that the following is true and correct:

1. I am a principal at the law firm of Morvillo, Abramowitz, Grand, Iason & Anello
P.C., counsel to the Applicants in the above-captioned matter. I am familiar with the facts and
circumstances of this matter, and I submit this declaration in support of the Applicants'
application for an order pursuant to 28 U.S.C. § 1782 for the issuance of subpoenas to Citibank
NA, HSBC Bank USA NA, Cadwalader, Wickersham & Taft LLP, and Jonathan Wainwright,
Esq.

2. Annexed hereto as Exhibit 1 is a proposed Subpoena Duces Tecum to Citibank
NA.

3. Annexed hereto as Exhibit 2 is a proposed Subpoena Duces Tecum to HSBC Bank USA NA.


4. Annexed hereto as Exhibit 3 is a proposed Subpoena Duces Tecum to Cadwalader, Wickersham & Taft LLP.

5. Annexed hereto as Exhibit 4 is a proposed Subpoena Duces Tecum to Jonathan Wainwright, Esq.

6. No previous application for this or any other similar relief has been made in this or any other U.S. District Court.

WHEREFORE, for the reasons set forth in the accompanying Memorandum of Law in Support of *Ex Parte* Application for Discovery Pursuant to 28 U.S.C. § 1782 and the Declaration of Ethan Schiff dated February 9, 2021 and the exhibits annexed thereto, Applicants respectfully request that the Court enter an order granting them leave to serve the subpoenas annexed hereto as Exhibits 1 through 4 on Citibank NA, HSBC Bank USA NA, Cadwalader, Wickersham & Taft LLP, and Jonathan Wainwright, Esq. respectively.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 10th day of February 2021 in New York, New York.


Jonathan S. Sack

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Contracting Company, and Sky Prime Investment
Company*